

#03126822

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION**

INTERNATIONAL TAX ADVISORS, INC.,)
a Nevada corporation, and CREATIVE TAX)
STRATEGIES, INC., a Nevada corporation,)
)
Plaintiffs,)

v

TAX LAW ASSOCIATES, LLC., a Nevada)
Limited Liability Company, TAX LAW)
ASSOCIATES, INC., a Georgia corporation,)
TAX LAW ADVISORS, INC., a Georgia)
corporation, MICHAEL SCOTT FUSSELL,)
an Individual, CRYSTAL KINDER, an Individual,)
and JOHN CERAMI, an Individual,)
)
Defendants.)

Case Number: 08 C 2222

Judge Castillo

Magistrate Judge Schenkier

MOTION FOR DEFAULT JUDGMENT OF JOHN CERAMI

NOW COME the Plaintiffs, INTERNATIONAL TAX ADVISORS, INC. and CREATIVE TAX STRATEGIES, INC., by and through their attorneys, RONALD L. BELL & ASSOCIATES, P.C., and for their Motion for Default Judgment against the Defendant, JOHN CERAMI, respectfully states as follows:

1. The Defendant, JOHN CERAMI, an Individual, was served with the Summons and Verified Complaint herein on May 1, 2008 (see Affidavit of Special Process Server attached hereto as Exhibit "A").

2. As of the date of this Motion, the Defendant, JOHN CERAMI, has failed, neglected and refused to file an Appearance, Answer or otherwise plead.

3. The Plaintiffs, INTERNATIONAL TAX ADVISORS, INC. and CREATIVE TAX STRATEGIES, INC., are entitled to a Default Judgment based on the Verified Complaint against the Defendant, JOHN CERAMI.

WHEREFORE, Plaintiffs, INTERNATIONAL TAX ADVISORS, INC. and CREATIVE TAX STRATEGIES, INC., by and through their attorneys, RONALD L. BELL & ASSOCIATES, P.C., requests this Honorable Court to:

- A. Enter a Default Judgment against Defendant, JOHN CERAMI, for an amount according to the proofs;
- B. Enjoin the Defendant, JOHN CERAMI, from any further infringement on Plaintiffs' copyrights; and
- C. For such other, further and different relief as this Court deems just and equitable.

Respectfully submitted,

RONALD L. BELL & ASSOCIATES, P.C.

By: s/Ronald L. Bell
Ronald L. Bell

RONALD L. BELL & ASSOCIATES, P.C.
Attorney for Plaintiffs
1275 Barclay Boulevard
Suite 100
Buffalo Grove, Illinois 60089
t#1-847-495-6000
f#1-847-495-6001
Attorney Number: 03126822

AO 440 (Rev. 05/00) Summons in a Civil Action

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

SUMMONS IN A CIVIL CASE

International Tax Advisors, Inc.
Creative Tax Strategies, Inc.

CASE NUMBER:

V.

ASSI

08CV2222

Tax Law Associates, LLC, Tax Law Associates,
Inc., Tax Law Advisors, Inc., Michael Scott
Fussell, Crystal Kinder, John Cerami

DESI
MAC

**JUDGE CASTILLO
MAG. JUDGE SCHENKIER**

TO: (Name and address of Defendant)

John Cerami
1221 South Point Court
Schaumburg, IL 60193

12805 Muir
Huntley IL

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

Ronald L. Bell
Ronald L. Bell & Associates, P.C.
1275 Barclay Blvd., Ste. 100
Buffalo Grove, IL 60089

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

MICHAEL W. DOBBINS, CLERK


(3) DEPUTY CLERK

APR 18 2008
DATE

EXHIBIT "A"

UNITED STATES DISTRICT COURT
Northern District of Illinois

International Tax Advisors, Inc.

Creative Tax Strategies, Inc.

V.

Tax Law Associates, LLC, Tax Law Associates, Inc.,

Tax Law Advisors, Inc., Michael Scott Fussell,

Crystal Kinder, John Cerami

08CV2222

Judge CASTILLO

Mag. Judge SCHENKIER

AFFIDAVIT OF SERVICE

I, **JEROME STOPPER** being first duly sworn on oath, depose and state that I am over the age of 21 and am not a party in this case. Service of:

SUMMONS AND COMPLAINT

The original of which is presently on file with the Clerk of the District Court was made on:

JOHN CERAMI, the **1ST** day of **MAY, 2008** at approximately **7:10 PM**, in the following manner:

(A) By handing a copy thereof to the within named:

_____, who is _____, of the approximate age of _____ years, being at the address of: _____

(B) By leaving a copy of the document with **CAROL CERAMI (Defendants wife)**, at the usual place of abode of said Defendant being, **12805 Muir, Huntley, IL**, with a person of suitable age and discretion then residing therein.

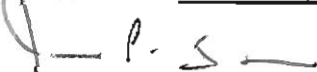
(C) Returned unexecuted: _____

(D) Other (Specify): _____

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of fees is true and correct.

Executed on **MAY 1ST, 2008** at approximately **7:10 PM**



Signature of Server

Licensed Private Detective 115-001967

5 Robert Court, Hawthorn Woods, IL 60047

Address of Server

EXHIBIT "A"